

(1)

1.1

April 5 1982

To: Western Processing File

From: K. Boateng and T. Tobin

Subj: Meeting on Western Processing

Western Processing Company, Inc., Kent, WA

On April 5, 1982, the following persons met to discuss future enforcement activities on the Western Processing Company, Inc. as part of EPA's RCRA activity:

USEPA SF



1518650

Kwasi Boateng

Ecology and Environment Inc.

624-9537

Thomas Tobin

Ecology and Environment Inc.

624-9537

Gary Brugger

Dept. of Ecology, Redmond

885-1900

John Conroy

Dept. of Ecology, Redmond

885-1900

Mike Dawda

Dept. of Ecology, Redmond

885-1900

②

Robert McCormick

Dept. of Ecology, Redmond

885-1900

Doug Hilderbrand

METRO (water quality)

447-6743

Bruce Burrow

METRO (water quality)

447-6743

Wally Swofford

Sc. King County Health Dept.

625-2125

Neil Thompson

EPA

442-2852

Background

Western Processing began operating at its present site in 1957 as a small animal blood by-product reprocessor. Subsequently, the facility has added various unit operations to handle heavy metal recovery, fly dust reclaiming, acid and caustic neutralization, and a number of chemical recombination reaction products especially the production of zinc chloride and lead chromate. The most recent

(3)

process is a fertilizer unit which pelletizes reclaimed ferrous sulfate as a moss inhibitor for use in fertilizers. Western Processing is under an EPA 3008 court order to comply with RCRA regulations.

Neil Thompson opened the meeting and provided the group the Western Processing Company with information about safety. According to Neipon, Western Processing Company, Inc. (hereafter called W.P.) applied for, and received, interim status (ISS) under the Resource Conservation and Recovery Act (RCRA) as a hazardous waste storer. Under interim status, W.P. cannot treat, dispose, or transport hazardous materials. The company's owner, Grant Nieuwenhuis,

claimed this his company is exempt from RCRA under section 261.6 (special requirements for hazardous waste material [261.6(a)2]) as W.P. recycles some listed hazardous materials. Neils stated that under 40CER 261.6, W.P. is allowed to accept non-listed wastes and small quantities of hazardous materials (under one ton or 1000 Kg) from small generators. W.P. can do what it wants with these waste materials even if the amount from several generator exceeds one ton. It is hoped that the new Washington State Department of Ecology (DOE) hazardous material regulations will be able to regulate these wastes, and waste quantities not regulated by RCRA.

W.P. can collect generic wastes (e.g., acetone)

and treat them. The company claims that the still bottom waste from their solvent recycling still is not hazardous and that they have been landfilling about a wheel barrel full /month of such waste on their property (a practice they discontinued recently) for several years (?). Presently, W.P. is trying to get the still bottom wastes [] deleted from the RCRA listed wastes but the EPA, according to Neel, is not about to do that.

At the present time, W.P. is handling solvents, paint sludges, pickle liquors, fine dust, many waste water containing 200 ppm phenols and 200 ppm chlorinated hydrocarbons. Neel and various DOE members stated that it appears that W.P.

(6)

has not been keeping any records on their waste disposal practices, especially on the quantities disposed of and where. They have been cited in the EPA's present legal action against W.P. (3008 Compliance Order).

Neil went on to explain that as a result of an EPA - State inspection of W.P., on March 31, 1981, W.P. was cited for numerous RCRA interim status violations (particularly 40 CFR 265) for that particular day. The facility has to comply with the 3008 compliance order but is fighting it. Neil sees W.P. as a 'consent decree' type of situation.

Doug Hilderbrand of METRO expressed METRO's concerns that W.P. may have been disposing of some of its liquid wastes through 1½" pipeline illegally

connected to a METRO sewer line along 72^o Avenue S.

METRO, DOE, and W.P. are going to meet on April 13

to discuss W.P. need for a NPDES permit; W.P. has

two current NPDES. It appears that W.P. never

complied with the NPDES permit sampling and reporting

requirements and apparently connected a 1½" line

to METRO's sewerage system. The City of Kent, during

a routine inspection, discovered this line. When the

W.P. 'discharge permit' expired in December 1981, the

company resubmitted an application for a new permit

to DOE. The DOE requested additional information

before issuing the permit; W.P. did not comply with

this request insisting that DOE did not inform

W.P. of the need for additional information. The result